



ICAO

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Manual on a Comprehensive Strategy for Combating Human Trafficking in the Aviation Sector

First Edition, 2023



Approved by and published under the authority of the Secretary General

INTERNATIONAL CIVIL AVIATION ORGANIZATION



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in the Aviation Sector***

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FOREWORD

This comprehensive strategy for combating human trafficking in the aviation sector (“comprehensive strategy” or “strategy”) seeks to provide a brief but far-reaching overview of the intersection of human trafficking and the aviation sector, and to equip States, civil aviation authorities (CAAs) and organizations, aircraft operators and airports with guidance and recommendations to inform the development of comprehensive trafficking strategies. While this strategy focuses on civil aviation entities, the guidance should be implemented within the context of broader multimodal transportation initiatives, and States should share it broadly across government agencies. This document should be distributed to all International Civil Aviation Organization (ICAO) regional offices and be shared with other international transportation organizations, including the International Maritime Organization (IMO).

This strategy covers key components of a comprehensive strategy, including human trafficking laws, leadership, policies (including social responsibility and employee responsibilities), reporting protocols, partnerships (including law enforcement and non-governmental organizations (NGOs)), training, public awareness, data collection and information-sharing and victim and survivor support. Additional resources in the appendices offer counter-trafficking tools for CAAs and organizations, aircraft operators and airports to adapt and tailor, including a model comprehensive strategy to combat trafficking, a proclamation and a public leadership statement.

As ICAO Member States progress in the development of their counter-trafficking initiatives, they are encouraged to adopt an approach most beneficial to victims and survivors by implementing survivor-informed, victim-centred and trauma-informed State hotlines (often operated by NGOs) and law enforcement to respond to potential instances of human trafficking. Such an approach ensures that first responders of human trafficking understand how trauma may affect victims’ responses to law enforcement and any services being offered. The goal of a survivor-informed, victim-centred and trauma-informed approach is to prioritize victims’ safety and security, maximize cooperation and ensure effective interventions by avoiding re-traumatization.¹ With survivor-informed, victim-centred and trauma-informed training, law enforcement can provide immediate and appropriate emergency assistance, and hotlines can provide non-emergency referrals and direct services to victims. In addition, ensuring that counter-trafficking programmes are survivor-informed, victim-centred and trauma-informed increases the quality of efforts to prevent human trafficking.

Robust comprehensive strategies for CAAs and organizations, aircraft operators and airports should address the following categories and actions:

- *Laws*: Ensure comprehensive strategies address international and State human trafficking laws in operating locations.
- *Leadership*: Issue a proclamation and public leadership statement outlining proactive counter-trafficking steps the organization is taking to combat human trafficking (see Appendix A, sections 1.2 and 1.3). Encourage any national strategy or action plan to underscore transportation’s important role, and aviation in particular, in combating human trafficking.
- *Policies*: Firstly, adopt a survivor-informed zero-tolerance policy regarding human trafficking, and include zero-tolerance clauses in contractual agreements with companies, agencies and other stakeholders; and secondly, institute counter-trafficking guidelines for survivor-informed employees that address organizational resources, business practices and violations.

1. See United Nations Office on Drugs and Crime, Global Programme Against Trafficking in Human Beings, *Toolkit to Combat Trafficking in Persons* (2006), available at <https://www.unodc.org/documents/human-trafficking/HT-toolkit-en.pdf>.

- *Reporting protocols and response mechanisms:* Implement clear protocols for employees to report suspected instances of human trafficking to survivor-informed, victim-centred and trauma-informed hotlines and law enforcement that avoid causing harm. Taking this action, in combination with appropriate response mechanisms, respond to Recommended Practice 8.49 in Annex 9 – *Facilitation*, “Contracting States should take measures to ensure that procedures in place to combat trafficking in persons are based on a Comprehensive Strategy and include clear reporting systems and relevant competent authorities’ points of contact for airport and aircraft operators.”
- *Partnerships:* Partner with government agencies, victim-centred and trauma-informed law enforcement, NGOs and other public and private stakeholders to increase victim identification, share information and maximize their collective impact in combating human trafficking. If they exist, join human trafficking task forces.
- *Training:* Train personnel to recognize and report suspected instances of human trafficking by using survivor-informed training materials, such as the ICAO counter-trafficking training,² to fulfil Recommended Practice 8.50 of Annex 9, “Contracting States should take measures to ensure that airport and aircraft operators’ personnel in direct contact with the travelling public are provided with awareness training on trafficking in persons.”
- *Public awareness:* Partner with public and private entities to implement public awareness campaigns on survivor-informed human trafficking for aviation personnel and the travelling public. Print, audio and digital awareness materials should include aviation sector indicators of human trafficking and victim-centred, trauma-informed reporting hotlines and law enforcement (see examples in Appendix C).
- *Data collection and information-sharing:* Track reports of human trafficking made by employees and the travelling public in airports and on aircraft, and share them with State CAAs and other relevant authorities.
- *Victim and survivor support:* Provide victim and survivor support by strategically disseminating and placing public awareness information and materials, placing law enforcement in high-risk locations and incorporating counter-trafficking into their corporate social responsibility programmes, which may include donating airline mileage and flight vouchers, and providing workforce development and employment opportunities to help survivors of human trafficking.

2. See ICAO, Tool for Capacity Building of Cabin Crew on Identifying and Responding to Trafficking in Persons (2020), available at <https://www.icao.int/safety/airnavigation/OPS/CabinSafety/Pages/Trafficking-in-Persons.aspx>.

CONTENTS

	<i>Page</i>
Chapter 1. Introduction	1-1
Chapter 2. Components of a comprehensive strategy	2-1
2.1 Introduction.....	2-1
2.2 Laws	2-1
2.3 Leadership	2-2
2.4 Policies.....	2-3
2.5 Reporting protocols.....	2-4
2.6 Partnerships	2-6
2.7 Training.....	2-7
2.8 Public awareness.....	2-9
2.9 Data collection and information-sharing	2-11
2.10 Victim and survivor support	2-12
Appendix A. Model comprehensive strategy to combat human trafficking for aviation organizations	App A-1
Appendix B. Indicators of human trafficking in the aviation sector.....	App B-1
Appendix C. Resources	App C-1

Chapter 1

INTRODUCTION

1.1 Human trafficking, or trafficking in persons, involves the recruitment, transport, transfer, harbouring or receipt of a person by such means as threat or use of force or other forms of coercion, abduction, fraud or deception for the purpose of exploitation.¹ The scourge is a multi-billion-dollar enterprise affecting adults and children globally² with intersections across all modes of transportation, including the aviation sector.

Note.— For further background on trafficking in persons, Circular 352 – Guidelines for Training Cabin Crew on Identifying and Responding to Trafficking in Persons includes additional information such as the elements of trafficking, why trafficking happens, the types of trafficking and general indicators of trafficking.

1.2 ICAO conducted a Survey on Initiatives to Combat Trafficking in Persons in Aviation in 2020 to gather information and monitor implementation of State and industry initiatives to combat human trafficking in the aviation sector. One hundred respondents shared the status of State-mandated trainings in counter-trafficking for aviation personnel that interact with the travelling public, industry trainings and measures that States are taking to ensure that procedures are in place to combat human trafficking specifically within aviation. Results are highlighted in relevant comprehensive strategy component categories throughout this manual.

1.3 When equipped with the knowledge to recognize and report potential instances of human trafficking to victim-centred, trauma-informed human trafficking hotlines and law enforcement, transportation ministry employees, aviation personnel and passengers can play an important role in helping to intercept and stop human trafficking.

1.4 This comprehensive strategy was developed by the Working Group on Human Trafficking (WGHT) of the Facilitation Panel (FALP), established at its Eleventh Meeting in Montréal in January 2020. This strategy fulfils the WGHT terms of reference,³ which include developing guidelines and assisting Member States to:

- a) create and implement a comprehensive facilitation-related strategy to combat human trafficking in civil aviation (the key components of such a strategy should include policies and reporting protocols, employee training, public awareness and data and information sharing, including with human trafficking survivors, NGOs and federal and local law enforcement); and
- b) establish policies and protocols related to responding to a suspected incident(s) of human trafficking that include clear lines of reporting to law enforcement agencies, responding to instances of potential human trafficking (through a victim-centred and trauma-informed approach so as not to endanger the potential victim or the persons reporting the suspected trafficking) and coordinating across State agencies, among States and with stakeholders (including airports and airlines).

1. See UN General Assembly, Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (2000), available at <https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons>.

2. See International Labour Organization and Walk Free Foundation, Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (2017), available at https://www.ilo.org/global/publications/books/WCMS_575479/lang-en/index.htm.

3. See ICAO FALP, Working Group on Human Trafficking: Terms of Reference, Membership, Work Programme (2020), available at <https://www.icao.int/Meetings/FALP/Documents/FALP11-2020/FALP11.WP3.WG%20on%20Human%20Trafficking-Final.pdf>.

1.5 This comprehensive strategy complements the existing counter-trafficking policies, guidance and other resources that were developed by ICAO to guide the aviation sector in their counter-trafficking efforts, including a general Resolution, two Recommended Practices, training guidelines, reporting guidelines, a training programme and a survey of Member States, as noted in 1.3 above (see Chapter 2, sections 2.2, 2.5 and 2.7 for further details). These resources are highlighted within their respective comprehensive strategy components throughout this manual. Focus areas of this strategy were based on submissions received by WGHT Member States and permanent advisor organizations, as documented in the 2020 WGHT Anti-Human Trafficking Call for Information and Baseline Report (“baseline report”).

Chapter 2

COMPONENTS OF A COMPREHENSIVE STRATEGY

2.1 INTRODUCTION

The baseline report of the WGHT, which reviewed existing policies and strategies across various Member States to combat human trafficking in civil aviation, was used to develop this comprehensive strategy. Aviation organizations should take particular care to ensure that they engage with human trafficking survivor-advocates in the development of a comprehensive strategy so that it is survivor-informed, with meaningful input from diverse survivors at every stage. Given their first-hand knowledge of the experience of human trafficking, survivor-advocates can provide critical input to ensure counter-trafficking initiatives are robust and practical. The WGHT recommends that organizations in the aviation sector develop comprehensive strategies inclusive of the components outlined in this chapter. A model comprehensive strategy for CAAs and organizations, aircraft operators and airports is also provided in Appendix A.

2.2 LAWS

2.2.1 Counter-trafficking legal frameworks are key foundational tools in combating human trafficking. Although the scope and definition of human trafficking may vary between State counter-trafficking laws, commonalities include an emphasis on preparation, prevention, protection and prosecution, and an understanding that trafficking requires an action, means and purpose; affects adults and children; lacks consent; does not require movement or border crossings; is distinct from human smuggling; and involves a range of labour and sexually exploitative practices.

2.2.2 In 2000, the adoption by the United Nations of the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (also known as the Palermo Protocol) marked a significant benchmark in international efforts to combat human trafficking. The Protocol, which has been signed and ratified by 147 States, requires implementing measures to prevent means of transport operated by commercial aircraft operators from being used in the commission of human trafficking. The purposes of the Palermo Protocol are to prevent and combat trafficking in persons, protect and assist victims of trafficking and promote cooperation among States to meet these objectives.

2.2.3 Examples of regional and State counter-trafficking legislation include the Council of Europe Convention on Action against Trafficking in Human Beings,¹ the Multilateral Cooperation Agreement to Combat Trafficking in Persons in West and Central Africa,² Greece's Preventing and Combating Trafficking in Human Beings and Protecting its Victims and Other Provisions law,³ and the United States Victims of Trafficking and Violence Protection Act.⁴

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1. See Council of Europe, Council of Europe Convention on Action against Trafficking in Human Beings (2005), available at <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/197>.
 2. See United Nations Office on Drugs and Crime, *Global Report on Trafficking in Persons* (2018), available at https://www.unodc.org/documents/data-and-analysis/glotip/2018/GLOTiP_2018_BOOK_web_small.pdf.
 3. National Referral Mechanism for the Protection of Victims of Human Trafficking. 2020. Survey ICAO HLWG: Greek NRM Response. *Unpublished document*. Athens: EMA.
 4. See United States, Victims of Trafficking and Violence Protection Act of 2000, Public Law 106-386 [H.R. 3244] (2000), available at <https://www.congress.gov/bill/106th-congress/house-bill/3244>.

2.2.4 Regional transportation-related laws include the European Union Council Framework Decision on the Strengthening of the Penal Framework to Prevent the Facilitation of Unauthorized Entry, Transit, and Residence;⁵ the Council of Europe Convention on Action against Trafficking in Human Beings; and the European Union Directive on Preventing and Combating Trafficking in Human Beings and Protecting its Victims.⁶

2.2.5 The United States passed aviation-specific counter-trafficking laws through the Federal Aviation Administration Extension, Safety and Security Act of 2016⁷ and Reauthorization Act of 2018,⁸ which require training certain public-facing aviation employees, such as flight attendants, ticket counter agents and gate agents, to recognize and respond to potential instances of human trafficking.

2.2.6 Some States have also implemented counter-trafficking supply chain laws that bear relevance for the transportation sector. In the United Kingdom, the Transparency in Supply Chains provisions of the Modern Slavery Act 2015 require organizations with a turnover of £36 million or more to publish an annual statement setting out the steps they are taking to tackle and prevent slavery and human trafficking in their operations and supply chains.⁹ The Modern Slavery Act 2018 requires all companies operating in Australia and meeting a threshold of \$A 100 million in total annual global revenue to report annually on their efforts to address modern slavery in their operations and supply chains.¹⁰ In France, the 2017 Corporate Duty of Vigilance Law requires parent and contracting companies and groups employing over 5 000 employees in France or more than 10 000 internationally over two consecutive years, to establish, implement and publish a vigilance plan to assess and address subcontracting supply chain risks, including serious infringements of human rights and fundamental freedoms.¹¹ Several French companies in the aviation sector have published one or more vigilance plans, including Aéroports de Paris, Air France-KLM, Airbus and Dassault Aviation. These types of supply chain measures encourage civil aviation businesses to consider modern slavery and human trafficking risks within their supply chains.

2.2.7 Once CAAs and organizations, aircraft operators and airports have ensured that their comprehensive strategies are informed by international and State human trafficking laws, they should take an organizational stand against human trafficking through their leadership.

2.3 LEADERSHIP

2.3.1 Counter-trafficking strategies, policies and protocols require leadership support to be successful. Leadership decisions are critical in allocating resources, implementing programmes, measuring impact and engaging with stakeholders.

5. See European Commission, Council Framework Decision 2002/946/JHA of 28 November 2002 on the strengthening of the penal framework to prevent the facilitation of unauthorized entry, transit and residence (2002), available at https://home-affairs.ec.europa.eu/pages/document/council-framework-decision-2002946jha-28-november-2002_en.

6. See European Commission, Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims, and replacing Council Framework Decision 2002/629/JHA, OJ L. 101/1-101/11; 15.4.2011, 2011/36/EU (2011), available at https://ec.europa.eu/anti-trafficking/legislation-and-case-law-eu-legislation-criminal-law/directive-201136eu_en.

7. See United States, FAA Extension, Safety, and Security Act of 2016, Public Law 114-190 [H.R. 636] (2016), available at <https://www.congress.gov/114/plaws/publ190/PLAW-114publ190.pdf>.

8. See United States, FAA Reauthorization Act of 2018, Public Law 115-254 [H.R. 302] (2018), available at <https://www.congress.gov/115/plaws/publ254/PLAW-115publ254.pdf>.

9. See United Kingdom. The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015, No. 1833 (2015), available at <https://www.legislation.gov.uk/ukdsi/2015/9780111138847>.

10. See Australia, Modern Slavery Act 2018, No. 153 (2018), available at <https://www.legislation.gov.au/Details/C2018A00153>.

11. See France, *Loi n° 2017-399 du 27 mars 2017 relative au devoir de vigilance des sociétés mères et des entreprises donneuses d'ordre* (2017), available at <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000034290626?r=PCNPdxkhp6>.

2.3.2 ICAO Member States took a public stand against human trafficking in September 2022 with the adoption of Resolution A41-16: Development and implementation of facilitation provisions – combatting human trafficking, during the 41th Session of the Assembly. This Resolution underscores the importance of aviation personnel training, model reporting protocols, victim-centred and trauma-informed law enforcement, raising public awareness and ensuring that relevant guidance material related to the issue of human trafficking is current and responsive to the needs of Member States.

2.3.3 Permanent advisor organizations such as the International Air Transport Association (IATA) and Airports Council International (ACI) took similar action with the adoption of the 2018 IATA Resolution Against Trafficking in Persons¹² and the 2016 ACI World General Assembly Prevention of Human Trafficking resolution.¹³ The IATA resolution emphasizes collaboration with government authorities and civil society, encourages training relevant operational staff and calls on government authorities to establish clear reporting mechanisms. The ACI resolution promotes raising awareness through media and at industry fora, urges employee training and supports partnering with governments, charities and NGOs to prevent human trafficking.

2.3.4 In the United States, the U.S. Department of Transportation (USDOT) established an Advisory Committee on Human Trafficking (ACHT) in 2018, comprised of representatives across all modes of transportation, labour associations, NGOs and law enforcement to develop counter-trafficking guidance and best practices for public entities, private industry, NGOs and local transportation authorities. The ACHT Final Report includes training and awareness best practices, quick implementation guides for each mode of transportation (including airlines and airports), sample materials and a model proclamation for transportation organizations to demonstrate their commitment to combating human trafficking.¹⁴ Such guidance is supported by the United States National Action Plan to Combat Human Trafficking, which emphasizes partnerships, training and public awareness to combat human trafficking in the transportation sector.¹⁵

2.3.5 In addition to issuing a proclamation and public leadership statement to combat human trafficking in aviation, CAAs and organizations, aircraft operators and airports should implement counter-trafficking organizational policies.

2.4 POLICIES

2.4.1 Social responsibility and employee responsibilities are key elements of a robust counter-trafficking comprehensive strategy, as emphasized in Circular 352, the ACI *Combatting Human Trafficking Handbook*,¹⁶ the IATA *Guidance on Human Trafficking*¹⁷ and the ACHT Final Report.

Note.— Circular 352 recommends arranging counter-trafficking policies under the following categories: a) commitment statement; b) description and definition of trafficking; c) responsibility and authority of flight crew; d) responsibility of cabin crew; e) responsibility of other operator personnel (including third party operating personnel); f) documentation and reporting; and g) training and procedures.

12. See IATA, Resolution Against Trafficking in Persons (2018), available at <https://www.iata.org/en/pressroom/pressroom-archive/2018-press-releases/2018-06-05-03/>.

13. See ACI, Resolution No. 2: Prevention of Human Trafficking (2016), available at <https://aci.aero/2016/09/28/airports-council-international-expressed-airports-commitment-to-the-fight-against-human-trafficking/>.

14. See USDOT ACHT, Combating Human Trafficking in the Transportation Sector Final Report (2019), available at <https://www.transportation.gov/sites/dot.gov/files/docs/mission/administrations/office-policy/343931/acht-final-report-section-508-compliant.pdf>.

15. United States White House. 2020. *The National Action Plan to Combat Human Trafficking*. Washington: White House.

16. See ACI, *Combatting Human Trafficking Handbook* (2019), available at <https://store.aci.aero/form/combating-human-trafficking-handbook>.

17. See IATA. 2018. *Guidance on Human Trafficking* (2018), available at <https://www.iata.org/contentassets/b24797c51f6a4b02a6b9036c49bc0b81/human-trafficking-guidelines-v1.pdf>.

2.4.2 Aircraft operators and airports can document a zero-tolerance position on human trafficking of all forms and transparency in combating the crime within their businesses and properties, including strong procurement policies and procedures. Such efforts are encouraged through the ACI *Combating Human Trafficking Handbook* and the IATA *Guidance on Human Trafficking*. Aircraft operators and airports such as All Nippon Airways,¹⁸ Delta Air Lines,¹⁹ Emirates Airlines,²⁰ Lufthansa,²¹ Gatwick Airport²² and Houston Airport Systems²³ have counter-trafficking supply chain policies in place. In Italy, airlines are required to develop a specific and detailed company policy for managing suspected cases of trafficking that includes a reporting system to the local authorities.²⁴

Note.— To support their zero-tolerance goals, CAAs and organizations, aircraft operators and airports should work in partnership with suppliers if necessary to resolve potential human trafficking risks.

2.4.3 Aircraft operator and airport personnel should be provided with counter-trafficking guidelines and responsibilities regarding the reporting of suspected instances of human trafficking, as noted in Circular 352, the ACI *Combating Human Trafficking Handbook* and the IATA *Guidance on Human Trafficking*. Counter-trafficking policies for employees should also address the prohibition of using organizational resources to support activities related to human trafficking, prohibitions on engaging with businesses that may be connected to human trafficking and measures that will be taken in response to potential violations.

2.4.4 Along with internal and external counter-trafficking policies, CAAs and organizations, aircraft operators and airports should have clear response protocols in place to guide employees in reporting suspected instances of human trafficking.

2.5 REPORTING PROTOCOLS

2.5.1 Reporting protocol policies are an important focus of a strong counter-trafficking comprehensive strategy, as emphasized in Circular 352, Circular 357 – *Guidelines for Reporting Trafficking in Persons by Flight and Cabin Crew*, the ACI *Combating Human Trafficking Handbook*, the IATA *Guidance on Human Trafficking* and the ACHT Final Report. Reporting protocols for employees should avoid causing potential harm to employees and victims, provide victim-centred, trauma-informed human trafficking hotline and law enforcement points of contact and specify detailed reporting guidelines. In September 2018, the FALP developed at its Tenth Meeting Recommended Practice 8.47 (now Recommended Practice 8.49 in the currently applicable version of Annex 9) on reporting human trafficking, which was later adopted by the Council and added to Annex 9.

Note.— Circular 352 emphasizes the importance of “Do no harm” to ensure that potential victims are not further jeopardized and to ensure the safety of fellow aviation personnel and members of the travelling public. The concept of “Do no harm” encompasses not confronting suspected traffickers, not attempting to rescue suspected victims, acting normally to avoid displaying unusual concern or alarm and being discreet when reporting information so as not to raise suspicion.

18. See All Nippon Airways, Human Rights Report 2020 (2020), available at

https://www.ana.co.jp/group/en/csr/effort/pdf/Human_Rights_Report_2020_e.pdf.

19. See Delta, United Nations Association Gives Delta ‘Humanitarian of the Year Award’ for work to fight trafficking (2019), available at <https://news.delta.com/united-nations-association-gives-delta-humanitarian-year-award-work-fight-trafficking>.

20. See Emirates Group, The Emirates Group Anti-Slavery and Human Trafficking Policy, available at

<https://c.ekstatic.net/ecl/documents/rules-and-notice/emirates-group-anti-slavery-and-human-trafficking-policy.pdf>.

21. See Lufthansa, Modern Slavery and Human Trafficking Statement (2020), available at <https://www.lufthansa-technik.com/en/slavery-trafficking>.

22. See Gatwick Airport, Slavery and human trafficking statement, available at <https://www.gatwickairport.com/business-community/about-gatwick/company-information/how-we-operate/modern-slavery-act>.

23. Abashawl, Saba, “Houston Airport Systems” (presentation, USDOT Combating Human Trafficking in Transportation virtual event, Washington, DC, December 8, 2020).

24. See Ente Nazionale Per L’Aviazione Civile, *Guidelines for Training Airport Staff and Flight Crew on Contrasting Human Trafficking* (2020), available at https://www.enac.gov.it/sites/default/files/allegati/2020-Set/Guidelines_for_training_airport_staff_and_flight_crew_on_contrasting_human_trafficking_FINAL.pdf.

2.5.2 The 100 respondents to the ICAO Survey on Initiatives to Combat Trafficking in Persons in Aviation indicated that 65 per cent of States take measures to ensure that procedures are in place to combat human trafficking in the aviation sector. Of those, 47 per cent provide relevant competent authorities' points of contact for airport and aircraft operators to report suspected cases of human trafficking, and 37 per cent provide clear reporting systems for airport and aircraft operators to report suspected cases of human trafficking.

2.5.3 For Recommended Practice 8.49 of Annex 9 to be effective, States should ensure that clear reporting protocols are in place with victim-centred and trauma-informed public and private partners to facilitate timely reporting. Public-facing aviation personnel, such as cabin crew, check-in counter agents, gate agents and security screeners can provide key information to victim-centred, trauma-informed human trafficking hotlines and law enforcement when reporting suspected instances of human trafficking. A standardized reporting chain and corresponding procedures can be employed to connect cockpit crew with responsible authorities via air traffic control or the aircraft operator, and connect ground staff with the appropriate authorities. The International Federation of Air Line Pilots' Associations (IFALPA),²⁵ IATA and the Blue Lightning Initiative from USDOT stress the importance of "real-time" reporting mechanisms through varied air-to-ground communication systems and reporting procedures. Circular 357 provides further guidance regarding reporting measures, as it is intended to assist Member States, their relevant authorities and operators in managing crew reports of suspected cases of trafficking in persons in aviation.

2.5.4 Links to appropriate reporting agencies are key in the process, such as the National Referral Mechanism (NRM) from the United Kingdom, which provides a framework for identifying victims of human trafficking and ensuring they receive the appropriate protection and support.²⁶ The NRM is also the mechanism through which the single competent authority collects data about victims, which contributes to building a clearer picture about the scope of human trafficking. The Blue Lightning Initiative trains aviation personnel to recognize and report potential instances of human trafficking on the ground, but also in flight, providing law enforcement with additional time to conduct research, analyse information and coordinate an appropriate and effective response before a flight lands. In Switzerland, the reporting methods at Zurich Airport include engaging with specialized law enforcement units and NGOs for a victim-centred response.²⁷ In Italy, the reporting point of contact for suspected human trafficking cases in aviation is locally identified at the Air Border Police Office present in each national airport, or is reported to the delegated office of the Police, Police Headquarters or the Stations of the Carabinieri and Police. ACI, IATA, IFALPA and the Blue Lightning Initiative allow for anonymous reporting to protect crew members and increase their likelihood of reporting a suspected human trafficking incident. Circular 352, the ACI *Combatting Human Trafficking Handbook* and the IATA *Guidance on Human Trafficking* also recommend specific reporting protocols for cabin crew to follow.

2.5.5 In addition to implementing clear reporting protocols, CAAs and organizations, aircraft operators and airports should develop public and private partnerships to bolster their efforts to combat human trafficking in the aviation sector.

25. See IFALPA, *Combatting Human Trafficking in Aviation* (2019), available at <https://www.ifalpa.org/media/3483/19pos12-combatting-human-trafficking-in-aviation.pdf>.

26. See United Kingdom Home Office, *National referral mechanism guidance: adult (England and Wales) (2020)*, available at [https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales#:~:text=The%20National%20Referral%20Mechanism%20\(%20NRM, human%20trafficking](https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales#:~:text=The%20National%20Referral%20Mechanism%20(%20NRM, human%20trafficking).

27. United Nations International Organization for Migration, Swiss Confederation. 2018. *Conclusions of the International Round Table "How Can Aviation Contribute to Combatting Human Trafficking?" Unpublished document*. Geneva: IOM.

2.6 PARTNERSHIPS

2.6.1 Public and private partnerships and taskforces among aircraft operators, airports, CAAs, government agencies, law enforcement and NGOs support victim-centred and trauma-informed responses to suspected instances of human trafficking. As noted in the Foreword, law enforcement officers who are trained to be victim-centred and trauma-informed are uniquely positioned to respond to human trafficking by identifying indicators and responding with an informed approach that is protective of potential victims and reporting individuals. NGOs run human trafficking hotlines and provide emergency, transitional and long-term services to victims and survivors of human trafficking, including crisis intervention, counselling, legal services, shelter and housing, health services, education, employment services, vocational training and transportation assistance. Comprehensive victim services support victim and survivor safety, independence, well-being and financial security. Effective partnerships can leverage engagements with diverse organizations possessing complementary and reinforcing strengths within different jurisdictions, allowing each partner to focus on central capacities and assets to produce outcomes with greater impact than can be achieved independently. Partnering with NGOs and prosecutors, in addition to other public and private entities, further supports a comprehensive approach by law enforcement as they share information and best practices. Such partnerships facilitate open communication channels for potential human trafficking reports, and can help to ensure victim-centred and trauma-informed action is taken when potential victims are identified. Such services enable victims to safely seek assistance from law enforcement, and to serve as witnesses for counter-trafficking investigations and prosecutions.

2.6.2 Circular 352 recommends that State CAAs partner and collaborate with other State agencies that mandate or provide counter-trafficking trainings. The ACI *Combatting Human Trafficking Handbook* and the ACHT Final Report also recommend partnering with public and private entities, including industry, labour, law enforcement and NGOs to maximize their collective impact in combating human trafficking in the aviation sector.

2.6.3 In Greece, airport community initiatives aimed at enhancing cooperation and coordination to prevent human trafficking collaborate with the Office of the National Rapporteur on Trafficking in Human Beings within the Ministry of Foreign Affairs as the national coordination authority that supervises and coordinates victim identification and referral.²⁸ In the United States, nearly 200 airports and aircraft operators committed to train their employees, raise awareness among the travelling public, and measure and share human trafficking-related data have signed the USDOT Transportation Leaders Against Human Trafficking (TLAHT) pledge, which includes over 500 signatories across all modes of transportation.²⁹

2.6.4 Partnerships between civil aviation entities and law enforcement have resulted in successfully preventing human trafficking. For example, a 2016 INTERPOL operation that targeted human trafficking in South and Central America by initially concentrating on three of the busiest international airports in South America resulted in the rescue of more than 2 700 victims, 134 arrests and the dismantling of at least seven organized crime networks.³⁰ Through access to global databases, frontline police at these airport hubs were able to check travellers' names and documents to help identify potential traffickers and their victims.

2.6.5 Recommended Practice 8.49 of Annex 9 recommends that States ensure that relevant competent authorities' points of contact are in place for airport and aircraft operators. Circular 352, the ACI *Combatting Human Trafficking Handbook*, the IATA *Guidance on Human Trafficking* and the ACHT Final Report recommend collaboration with law enforcement agencies to assist them in detecting and disrupting potential instances of human trafficking. In Switzerland, police officers at Zurich Airport are trained to recognize unusual or suspect behaviours. After potential suspects undergo a first-line credibility assessment, any inconsistencies require in-depth clarification through a second round of checks.

28. Hellenic Ministry of Foreign Affairs Office of the National Rapporteur on Trafficking in Human Beings. 2020. ICAO Survey on Human Trafficking. *Unpublished document*. Athens: ONRHT.

29. See U.S. Department of Transportation, Transportation Leaders Against Human Trafficking, available at <https://www.transportation.gov/TLAHT>.

30. See INTERPOL, More than 2,700 Human Trafficking Victims Rescued in INTERPOL-Coordinated Operation (2016), available at <https://www.interpol.int/en/News-and-Events/News/2016/More-than-2-700-human-trafficking-victims-rescued-in-INTERPOL-coordinated-operation>.

The specialized police officers also perform profiling and risk analysis regarding suspected trafficking based on passenger data before planes land. In Portugal, aviation stakeholders and law enforcement agencies collaborate closely at airports, including government-trained law enforcement personnel assigned to Lisbon Airport.³¹ In Japan, in preparation for the Tokyo 2020 Olympic and Paralympic Games, Narita Airport co-sponsored a seminar on human trafficking with All Nippon Airways in partnership with the National Police Agency and the International Organization for Migration.³²

2.6.6 The 2020 Trafficking in Persons Report, the source for most of the State examples referenced throughout this strategy, includes numerous examples of counter-trafficking partnerships between civil aviation organizations and law enforcement. In Brazil, the Ministry of Justice and Public Security maintained nine posts at airports to facilitate the interdiction of human traffickers. Georgian authorities screened Georgia nationals deported from other countries for trafficking indicators at international airport and border crossings. The Lebanese General Security Directorate maintained a programme to inform artist visa holders about restrictions and obligations of their visa status upon arrival to Beirut International Airport, and ensured that airport officers returned passports directly to foreign domestic workers upon their arrival. In the Philippines, the Department of Justice oversaw and supported operations and training for 24 interagency anti-trafficking task forces, including six air and seaport task forces and a task force at Manila International Airport. The Government of Spain implemented victim identification protocols at Madrid Airport. In Togo, the Human Trafficking Task Force is comprised of several government agencies, including the airports' authority and the national police. The United States' Blue Lightning Initiative has over 50 aviation partners, including aircraft operators and airports, which have trained public-facing aviation personnel to recognize human trafficking and report potential instances to appropriate law enforcement. In Zambia, the Victim Support Unit of the Police Service designed a primary focal point to coordinate the reporting and response to combat human trafficking cases, including at all international airports.

2.6.7 CAAs and organizations, aircraft operators and airports may also be able to collaborate with public and private partners in implementing counter-trafficking training for their employees. National air transport facilitation programmes established under Annex 9 may be helpful in this regard.

2.7 TRAINING

2.7.1 When frontline aviation personnel are trained to recognize and respond to suspected human trafficking, actionable tips can be provided to victim-centred and trauma-informed law enforcement. Such efforts align with Recommended Practice 8.50 of Annex 9.

2.7.2 The ICAO Survey on Initiatives to Combat Trafficking in Persons in Aviation found that 23 per cent of respondents have counter-trafficking training mandated by the State for either all or some personnel in direct contact with the travelling public. Of those, 69 per cent said that their trainings are in line with Circular 352. Fifty-four per cent of respondents said that their State aviation industry provides counter-trafficking awareness training for their personnel. Of those, 40 per cent provide training for aircraft operators, 27 per cent for airport operators and 23 per cent for ground handling services. Implementation of training should include the provision of training programmes with proper oversight that address the definition of human trafficking, various forms of the crime, aviation-specific indicators, the reason why trafficking occurs, applicable laws, appropriate reporting channels and success stories. Training programmes should comply with relevant national measures and international guidelines, and can be mandated for orientation of new employees as well as annually for all public-facing personnel.

2.7.3 Circular 352 provides States and operators with a training framework for human trafficking detection and reporting with a particular emphasis on the role of cabin crew members. The ICAO Tool for Capacity Building of Cabin Crew on Identifying and Responding to Trafficking in Persons is a training programme that supports the implementation

31. United States. 2019. *Trafficking in Persons Report*. Washington: Office of the Under Secretary for Global Affairs.

32. See ACI, Narita Airport Continues Campaign to Address Human Trafficking (2020), available at <https://www.aci-asiapac.aero/media-centre/news/narita-airport-continues-campaign-to-address-human-trafficking>.

of Circular 352, and was developed in cooperation with the United Nations High Commissioner for Human Rights. The free e-learning course increases understanding of human trafficking, and trains aviation personnel to identify and respond to potential instances of human trafficking. The training includes the elements of human trafficking, potential vulnerabilities, current efforts to combat human trafficking, how to report suspected occurrences and video interviews of airlines with established counter-trafficking trainings. Resources such as Circular 352, the ACI *Combatting Human Trafficking Handbook*, the IATA *Guidance on Human Trafficking* and the ACHT Final Report include aviation-specific indicators of human trafficking in addition to key areas counter-trafficking trainings should address.

2.7.4 In the first Member State response to Recommended Practice 8.50 of Annex 9, the Italian Civil Aviation Authority issued Guidelines for Training Airport Staff and Flight Crew on Contrasting Human Trafficking in 2020. The guidelines recommend initial and periodic annual training for employees of CAAs, aircraft operators, airports and security providers. In the United Kingdom, the counter-trafficking training programme of Heathrow Airport includes a suggested lesson plan for addressing human trafficking alongside security awareness training or as a stand-alone topic, and its e-learning training plan is tailored to the airport's policy and reporting procedures. In Greece, with the aim of capacity building and bringing in more professional groups in identification and referral of presumed victims, the NRM, the National Centre for Public Administration and Local Government and international organizations provided trainings to the personnel of Athens International Airport.³³ More than 50 aviation partners have trained over 100 000 public-facing aviation personnel to recognize and report potential instances of human trafficking through the Blue Lightning Initiative. The interactive video training module of the Blue Lightning Initiative outlines common indicators of human trafficking that aviation personnel may encounter, and includes supplemental materials on human trafficking indicators, such as an indicator card for aviation personnel to be used as a reference, a public awareness poster for employee break rooms and a pocket guide. The ACI e-learning course addresses the role that airports can play in combating human trafficking, in addition to highlighting effective policies, indicators, employee training, public awareness measures and case studies.³⁴

2.7.5 The 2020 Trafficking in Persons Report includes many reports of counter-trafficking trainings for aviation personnel. In Angola, the Ministry of Justice and Human Rights trained 50 officials at Luanda International Airport. A task force in Antigua and Barbuda conducted trafficking awareness sessions for 118 customs officers and 23 new airport staff. The Gambian National Agency Against Trafficking in Persons trained 30 travel agencies and airlines on victim identification. In Japan, authorities established a new consultative mechanism with the aviation industry to train flight attendants on victim identification and referral to law enforcement. In the Netherlands, authorities trained aviation and customs inspection staff in methods to identify human trafficking victims and child sex tourism. Immigration New Zealand engaged with the airline industry to review trafficking training materials provided to flight crews. In Singapore, the human trafficking task force partnered with the Civil Aviation Society of Singapore to train airline service workers on trafficking awareness and detection and provided trafficking training materials. The Government of Slovakia provided counter-trafficking training on victim identification to aviation personnel, including 300 officers and 25 border guards. In Suriname, 40 officials from government agencies, including airport authorities, participated in trafficking awareness training. The UK Border Force shared training and support materials with airlines to teach employees about indicators of modern slavery and how to report concerns, leading to referrals to the UK Border Force via the Modern Slavery Helpline.

2.7.6 Examples of additional training efforts in counter trafficking for airports and aircraft operators include:

- a) Gatwick Airport training security officers and other passenger staff;
- b) AirAsia Foundation training nearly 1 600 AirAsia cabin crew staff and other personnel as first responders in the fight against human trafficking;

33. See Hellenic Republic Ministry of Foreign Affairs, Human Trafficking (2020), available at <https://www.mfa.gr/en/foreign-policy/global-issues/human-trafficking.html>.

34. See ACI, *Combatting Human Trafficking* (2020), available at <https://www.olc.aero/product/combating-human-trafficking>.

- c) Houston Airport System training 2 800 regular and contract employees in cooperation with local and federal law enforcement;
- d) Lufthansa providing training to pilots and flight attendants;
- e) San Francisco Airport conducting training for customer-facing employees;³⁵
- f) United Arab Emirates training security personnel at Dubai International Airport on how to spot potential traffickers while checking travel documents, and conducting passenger profiling and behavioural analysis;³⁶
- g) All Nippon Airways training 94 per cent of its employees through an e-learning programme that remains compulsory for all new cabin attendants;
- h) Narita International Airport providing counter-trafficking training to staff members; and
- i) Delta Air Lines training over 66 000 employees to recognize and respond to human trafficking.

2.7.7 In addition to training personnel to recognize and report suspected instances of human trafficking, CAAs and organizations, aircraft operators and airports should raise public awareness among the travelling public in airports and on aircraft.

2.8 PUBLIC AWARENESS

2.8.1 Aircraft operators and airports can help to prevent human trafficking by raising awareness among passengers to increase the general public's understanding of human trafficking indicators and how to report suspected instances. The 100 respondents to the ICAO Survey on Initiatives to Combat Trafficking in Persons in Aviation indicated that of the 65 per cent of States that take measures to ensure that procedures are in place to combat human trafficking in the aviation sector, 35 per cent provide awareness campaigns. Effective measures include press conferences, press releases, videos, signage, exhibitions, public awareness posters, flyers, wallet cards, public service announcements, blogs, social media and email messages. Public restrooms in particular, often the sole location in which victims may find themselves alone, are excellent opportunities for CAAs and organizations, aircraft operators and airports to raise awareness through public awareness posters and the inclusion of victim-centred and trauma-informed human trafficking hotline and law enforcement phone numbers. In addition to reporting information, awareness materials should at a minimum address both labour and sex trafficking. The inclusion of aviation-specific indicators of human trafficking also provide helpful reminders for aviation personnel and passengers (see Appendix B). Panic buttons are also useful for potential victims to press to immediately notify victim-centred and trauma-informed security that they need assistance.

2.8.2 The counter-trafficking training of ICAO is supplemented by a public awareness video that includes an interview with a survivor. The ACI *Combatting Human Trafficking Handbook* and the ACHT Final Report include sample public awareness materials. The IATA Eyes Open public awareness campaign includes a video that facilitates discussions between passengers, airlines and government.³⁷ In Greece, the Ministry of Foreign Affairs' Office of the National Rapporteur on Trafficking Human Beings supported the development of a counter-trafficking conference in 2019, hosted by the Athens International Airport, Athens Airport Police and Aegean Airlines. The conference raised awareness regarding human trafficking among front-line airport professionals and highlighted best practices for cooperation with law

35. See San Francisco Airport, Stop Human Trafficking, available at <https://www.flysfo.com/community/stop-human-trafficking>.

36. See United Arab Emirates, Emirates Helps Shine a Spotlight on the Issue of Human Trafficking (2020), available at <https://www.emirates.com/media-centre/emirates-helps-shine-a-spotlight-on-the-issue-of-human-trafficking>.

37. See IATA. *Human Trafficking (HT)*, available at <https://www.iata.org/en/programs/passenger/human-trafficking/>.

enforcement. In Brazil, the Public Ministry of Labour launched the project Freedom in the Air aimed at the airport sector. Under the project, which will run for the next four years, airports throughout Brazil are broadcasting videos and distributing leaflets and comics. The multilingual material explains the tricks of the traffickers, the reasons people become victims of human trafficking and how airport and airline staff and passengers can take appropriate action.³⁸

2.8.3 An NGO from Toronto partnered with Canadian airports to launch a public awareness campaign that included counter-trafficking advertisements in and around airports. USDOT co-branded and facilitated the placement of public awareness campaigns with an NGO as part of the Transportation Leaders Against Human Trafficking initiative in Dallas Fort Worth International Airport, O'Hare International Airport, John F. Kennedy International Airport, LaGuardia Airport and Dulles International Airport.³⁹ In the United States, the Seattle-Tacoma International Airport and Hartsfield-Jackson Atlanta International Airport partnered with NGOs to develop training for employees and conduct public awareness campaigns for aviation employees and travellers. Also in the United States, the Houston Airport System counter-trafficking programme includes partnerships with numerous NGOs to raise awareness throughout their airports with public service announcements.

2.8.4 The 2020 Trafficking in Persons Report from the U.S. Department of State highlights many examples of public and private counter-trafficking partnerships to combat human trafficking in the aviation sector. In Europe, the Government of Austria made efforts to reduce the demand for participation in international sex tourism by its citizens by airing an awareness video in airports and on outbound flights, and by raising awareness within the tourism industry. In cooperation with an NGO, the Civil Guard of Spain distributed awareness brochures in nine languages at airports that included indicators of human trafficking.

2.8.5 In Africa, the border campaign of the Eswatini Secretariat placed public awareness posters in airports to raise awareness regarding human trafficking. The National Office to Combat Human Trafficking of Madagascar partnered with an international organization to develop a permanent video broadcast on the risks of dangerous migration and human trafficking that played in Ivato International Airport. In Nigeria, the National Agency for the Prohibition of Trafficking in Persons implemented measures at Lagos International Airport and coordinated with the aviation sector to raise awareness regarding human trafficking and available resources for trafficking victims. The Government of Togo used airport advertisements to raise awareness regarding human trafficking.

2.8.6 In Asia, the Bhutan Department of Law and Order partnered with an international organization to support public awareness events on human trafficking for airport officials. The Republic of Korea publicized the illegality of child sex tourism in airports to reduce the demand for commercial sex acts. Malaysian labour officials provided banners and other signage at the Kuala Lumpur International Airport in holding lounges for newly arrived migrant workers in a range of languages to help educate foreign workers about their rights in Malaysia. The Government of Thailand displayed a video in four languages, discouraging child sex tourism in Thai airports and on Thai airline flights to reduce the demand for commercial sex acts.

2.8.7 In the Americas, the Belize Anti-Trafficking in Persons Council established a trafficking information kiosk at an international airport, which included resources for potential victims in multiple languages. As part of a counter-trafficking campaign, the Dominican Republic Commission against Trafficking in Persons and Smuggling of Migrants distributed information and public awareness posters funded by international partners at several airports to warn passengers of the penalties associated with sexual exploitation. The Guatemala Secretariat against Sexual Violence, Exploitation, and Trafficking in Persons placed billboards and commercials in the main national airport to combat commercial sexual exploitation of children in the travel and tourism industry. The Government of Paraguay posted public awareness materials in airports. In Saint Vincent and the Grenadines, the Anti-Trafficking in Persons Unit collaborated with the Royal St. Vincent and the Grenadines Police Force under the auspices of the National Task Force Against Trafficking in Persons to hold an

38. See United Nations, UNODC partners with Brazil on the 'Freedom in the Air' initiative, available at <https://www.unodc.org/unodc/en/frontpage/2020/September/unodc-partners-with-brazil-on-freedom-in-the-air-initiative.html>.

39. See U.S. Department of Transportation, *Budget Highlights 2020* (2020), available at <https://www.transportation.gov/sites/dot.gov/files/docs/mission/budget/333126/budgethighlightsfinal040519.pdf>.

airport-based project that included a variety of human trafficking public awareness materials, including standing banners in the arrival and departure lounges, stickers at counters and a 30-second video.

2.8.8 In the Middle East, the Bahrain Labour Market Regulatory Authority provided booklets outlining labour rights in 13 languages common among expatriate and migrant worker populations, and distributed them to such populations upon their arrival at the Bahrain International Airport. The Government of Iraq raised awareness about human trafficking by advertising its counter-trafficking hotline, posting information at airports and working with airlines to raise awareness. The Government of Ireland distributed human trafficking leaflets at airports. In collaboration with an international organization, Kuwaiti ministries conducted public awareness campaigns at the international airport that included warnings against using illegal domestic labour recruitment companies, and dissemination of pamphlets in airports to educate migrant workers on their rights. In Saudi Arabia, the King Khalid International Airport displayed information on trafficking indicators and associated penalties. The Government of the United Arab Emirates educated passengers at Dubai International Airport through clips, broadcasts, flyers and tactically-situated massive banners in nine prominent languages. The airport also partnered with the National Committee to Combat Human Trafficking, the Dubai Police and an international organization to launch a two-year campaign to raise awareness regarding human trafficking among airport employees and travellers.

2.8.9 Additional efforts to raise counter-trafficking awareness among aircraft operators and at airports include Delta Air Lines providing an in-flight video for passengers that shows how a child can be trafficked,⁴⁰ Emirates Airlines displaying a short counter-trafficking film through their inflight entertainment system on all flights and Narita Airport raising awareness through leaflets and public awareness posters throughout airport premises.

2.8.10 In addition to raising public awareness among the travelling public, CAAs and organizations, aircraft operators and airports should support data collection and information-sharing efforts regarding the intersection of human trafficking and transportation.

2.9 DATA COLLECTION AND INFORMATION-SHARING

2.9.1 Data collection and information-sharing can help enhance the limited statistics available regarding human trafficking within the aviation sector. Aviation organizations can track reports of human trafficking made by employees and members of the travelling public and share them with CAAs and other relevant authorities. Collectively, these reports can help to identify intersections between aviation employees, trafficking victims and traffickers; aviation-specific indicators of human trafficking; and trafficking routes, hotspots and patterns within and between States. Transportation policymakers and stakeholders, armed with this knowledge, would be better equipped to determine when and where to allocate resources, enable key strategic counter-trafficking initiatives and focus intervention efforts. Aviation stakeholders can also draw upon the data to bolster counter-trafficking strategies, awareness trainings, public awareness campaigns and other targeted initiatives.

2.9.2 Circular 352 encourages documenting cases reported by crew members, without attribution, to track trends at the operator level and to assist law enforcement. Switzerland passed legislation in 2018 requiring aircraft operators to cooperate with authorities regarding suspected criminal offences by transferring relevant passenger data. In the United States, the Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018 requires certain air carriers to track the number of personnel trained to recognize and report human trafficking, the number of notifications received from staff and passengers and whether the air carrier notified the National Human Trafficking Hotline or law enforcement at the relevant airport.⁴¹ Also, in the United States, the winner of USDOT inaugural Solicitation for Annual Combating Human Trafficking in Transportation Impact Award conducted an international survey of transportation stakeholders and survivors across all modes of transportation in 2021, including airlines and airports.

40. See Delta, Stop Human Trafficking, available at <https://www.delta.com/us/en/about-delta/stop-human-trafficking>.

41. See United States, *Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018*, Public Law 115-425 [H.R. 2200] (2018), available at <https://www.congress.gov/bill/115th-congress/house-bill/2200>.

2.9.3 In addition to efforts to bolster data collection and information-sharing on the intersection of human trafficking and transportation, CAAs and organizations, aircraft operators and airports should provide support to victims and survivors.

2.10 VICTIM AND SURVIVOR SUPPORT

2.10.1 Victims and survivors of human trafficking have experienced severe trauma, been deprived of basic human rights and opportunities and require support to rebuild their lives. Aircraft operators and airports can support victims by providing awareness materials in discrete locations, such as toilet booths, and at locations where interactions with authorities occur. Distribution of survivor-informed awareness materials should address sex and labour trafficking, and include human trafficking indicators and reporting guidance. Aircraft operators can support survivors by donating flight vouchers to non-governmental counter-trafficking support organizations to help victims leave their trafficking situation. Aircraft operators and airports can also provide workforce development and employment opportunities for survivors. The ACI *Combating Human Trafficking Handbook* recommends that airports support the activities of governments, charities and NGOs that are involved in preventing human trafficking.

2.10.2 In Greece, trafficking victims from other countries are provided with police assistance when in transport, are given the option of voluntary return to their countries of origin and are assisted during their repatriation process. In the United Kingdom, adult trafficking survivors are provided with support including emergency accommodation, medical care and counselling, financial support, translation and interpretation services, legal advice and, if the victim wishes, assistance to return to their home country.⁴² Delta Air Lines has offered apprenticeships for survivors to offer employment, support professional development and provide career re-entry skills at its corporate headquarters; donated over six million frequent flyer miles through their SkyWish programme to provide over 100 flights for trafficking survivors to return to safety or receive critical services; funded anti-trafficking NGO Polaris by contributing \$2.5 million towards the National Human Trafficking Hotline since 2017; and provided volunteer opportunities in 16 Delta Air Lines serviced cities for employees to give time and service to counter-trafficking organizations in their local communities.

2.10.3 The 2020 Trafficking in Persons Report includes some State efforts to assist trafficking victims and survivors, such as the governments of Ecuador, Kuwait, Kyrgyzstan, Madagascar and Qatar providing repatriation assistance to victims seeking to return to their home countries. The Government of Bangladesh opened a desk at the airport that provided funding and information on available NGO services to returning female migrant workers, including trafficking victims. In the Philippines, the government began constructing a temporary shelter and one-stop centre near a regional international airport with comprehensive care for trafficking victims, including airport assistance and transportation assistance. Members of the Philippines Inter-Agency Council Against Trafficking Secretariat also met arriving repatriation flights from the Middle East and Asia to coordinate individualized assistance for 1 143 trafficking victims.

2.10.4 Beyond strategic placement of law enforcement and public awareness materials, flight vouchers and employment opportunities, CAAs and organizations, aircraft operators and airports can also partner with NGOs to consider additional support initiatives for victims and survivors tailored for their region.

42. See United Kingdom, Home Office, *Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland* (2021), available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/950690/January_2021_-_Modern_Slavery_Statutory_Guidance_E_W_Non-Statutory_Guidance_S_NI_v2.pdf.

Appendix A

MODEL COMPREHENSIVE STRATEGY TO COMBAT HUMAN TRAFFICKING FOR AVIATION ORGANIZATIONS

1.1 COMPREHENSIVE STRATEGY

The following model comprehensive strategy to combat human trafficking was created as a tool for aviation organizations to adapt and implement. The strategy includes a definition of human trafficking, leadership and funding, partnerships, legal compliance, social responsibility, employee responsibilities and reporting protocols, education and training, public awareness and outreach, data collection and information-sharing and victim and survivor support.

Note.— This model comprehensive strategy was adapted from the USDOT ACHT Final Report and Circular 352.

[Organization Name] Comprehensive strategy to combat human trafficking

[Date]

[Organization Name] condemns all forms of human trafficking, fully supports the elimination of the exploitation of human beings and has published an organizational statement against human trafficking (see sections 1.2, proclamation, and 1.3, leadership statement). [Organization Name] will not condone human trafficking in any part of its organization, and its policies and procedures reflect a strong commitment to upholding the belief that every person has the right to safety and security.

The United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (also known as the Palermo Protocol) defines human trafficking as:

“(a) “Trafficking in persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;

(b) The consent of a victim of trafficking in persons to the intended exploitation set forth in subparagraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used;

(c) The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons” even if this does not involve any of the means set forth in subparagraph (a) of this article;

(d) “Child” shall mean any person under eighteen years of age.”¹

1. While the Palermo Protocol refers to a “child”, aviation entities should rely upon the ICAO term of “minor” as defined in Annex 9.

Leadership and funding

The leadership of [Organization Name] endorses and supports the policies and initiatives to combat human trafficking below, including assigning the necessary funds to support their implementation.

Partnerships

[Organization Name] joins with its partners across the aviation sector to stop human trafficking through leadership, education and training, policy implementation, public awareness and outreach, data collection, information-sharing and victim and survivor support. [Organization Name] leverages existing resources and partnerships both to reduce duplication and to maximize the collective impact of efforts to combat human trafficking by aviation sector stakeholders.

Legal compliance

[Organization Name] strictly complies with all applicable laws and regulations regarding the prevention of human trafficking, and cooperates with law enforcement authorities to address instances of human trafficking which [Organization Name] or its employees have witnessed or become a party to.

Social responsibility

[Organization Name] has no tolerance for human trafficking. [Organization Name] is committed to acting ethically within business dealings and ensuring that human trafficking is not tolerated in the organization or supply chains, and expects its partners, contractors and suppliers to uphold the same standards. [Organization Name] also commits to helping to reduce the probability that its properties will be used as a transit point for traffickers and their victims.

Employee responsibilities

Employees must be vigilant and immediately report, as appropriate, all situations that come to their attention within [Organization Name] premises or businesses where human trafficking and/or exploitation is suspected or appears to be intended. Under no circumstances may the funds, property or personnel of [Organization Name] be used to further or support activities that participate in human trafficking and/or human exploitation. This includes [Organization Name] vehicles, buildings, facilities, parking lots, grounds, technology, equipment, computers, storage devices, software, websites, social media channels, networks, phones (including cell phones), funds (including company credit cards and expense accounts) and [Organization Name]-funded hotel rooms, goods and services.

No employee may:

- Use or allow the use of any of the facilities, resources or equipment of [Organization Name] to support human trafficking and/or the exploitation of human beings.
- Use any [Organization Name] resources, including credit cards and expense accounts, to buy sex.
- Create, download, view, store, copy or transmit content that is sexually explicit or sexually-oriented during work hours, while travelling on business, while engaged in any work-related activities or using [Organization Name] resources.
- View or search online advertisements for commercial sex during work hours, while working on company business, while engaged in any work-related activities or using [Organization Name] resources.

- View or search websites where adult entertainment is offered for sale during work hours, while working on company business, while engaged in any work-related activities or using [Organization Name] resources.
- Enter into, on behalf of [Organization Name] or otherwise, any business relationships or any other arrangement with any organization which the employee has reason to believe participates in any way in human trafficking or the exploitation of human beings.

Employees who violate this policy may be subject to disciplinary action, up to and including termination. All employees have a responsibility for ensuring that this policy is followed. Concerns and potential violations should be reported to the point of contact of [Organization Name]. [Organization Name] strictly prohibits retaliation against any employee for making a report in good faith of any potential or suspected violation of this policy or for cooperating in any investigation of such violation.

Reporting protocol – For suspected human trafficking, employees should:

- When dealing with suspected cases of human trafficking, make every effort to avoid causing harm to themselves or to the potential victim.
- Not confront the trafficker.
- Not attempt to rescue the victim.
- Assess the situation and if indicators are present: act naturally, do not display unusual concern or alarm, do not probe and do not intervene.
- Avoid becoming directly involved in a suspected human trafficking situation.

Note.— To avoid causing harm to potential victims or themselves, employees are recommended to report suspected instances of human trafficking to trained law enforcement rather than engaging directly with potential victims or traffickers.

- [For on-the-ground employees] Leave and go to a safe place to contact [insert victim-centred, trauma-informed airport reporting protocol point of contact]. If employees suspect there is a threat of immediate harm to a suspected victim, they should call [insert Member State emergency victim-centred and trauma-informed law enforcement number].
- [For in-flight employees] Report their concerns to [insert aircraft operator victim-centred and trauma-informed reporting protocol point of contact].
- If there is no immediate danger to suspected victims, call [insert Member State victim-centred and trauma-informed human trafficking hotline, if available].
- Make note of the date and time of the suspected incident, description of those involved (include tattoos, physical identifiers, hair colour, approximate age, etc.), any names or nicknames overheard, a summary of the situation that prompted the report and their flight number and destination.
- Share the reporting of their tip with [Organization Name] [point of contact].
- For further questions or information, contact [Organization Name] [point of contact].

Reporting protocol – If approached by a victim, employees should:

- If the victim is in immediate danger, call [insert Member State emergency victim-centred and trauma-informed law enforcement number].
- If there is no immediate danger to the victim, call [insert Member State victim-centred and trauma-informed human trafficking hotline, if available].
- Ensure that the victim feels safe throughout the process until the appropriate responder arrives.
- Share the reporting of their tip with [Organization Name] [point of contact].
- For further questions or information, contact [Organization Name] [point of contact].

Education and training

To ensure a high level of understanding of the risks of human trafficking, all employees have been informed of the expectations of [Organization Name] regarding human trafficking and received initial and annual training that is compatible with Circular 352.

Public awareness and outreach

[Organization Name] raises awareness about human trafficking in areas that are frequented by employees and travellers by conducting and participating in public awareness campaigns. [Organization Name] leverages public touchpoints to spread the message to combat human trafficking.

Data collection and information-sharing

[Organization Name] has developed reporting and documentation protocols, and will share any relevant data and case studies gathered annually with [Member State CAA].

Victim and survivor support

[Organization Name] posts survivor-informed awareness materials for potential victims, donates transportation service vouchers to a victim services organization to support victims in their escape and survivors in their recovery. In addition, [Organization Name] has established workforce development opportunities for survivors and a survivor-informed “second chance” employment programme.

1.2 PROCLAMATION

Below is a model proclamation that aircraft operators and airports can adopt to demonstrate their commitment to combating human trafficking.

Note.— The development of this proclamation was informed by the model proclamation contained in the USDOT ACHT Final Report.

[Organization Name] Proclamation to combat human trafficking

[Date]

WHEREAS, Every year, nearly 25 million adults and children are trafficked and deprived of their freedom, human rights and dignity;

WHEREAS, Human trafficking includes the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. The recruitment, transportation, transfer, harbouring or receipt of anyone under the age of 18 for the purpose of exploitation is considered human trafficking under any circumstances;

WHEREAS, [Member State Name] (if they have done the following) has enacted comprehensive laws to prevent human trafficking, with a focus on criminal prosecution and victim support;

WHEREAS, [Organization Name] recognizes the considerable moral and economic harm of human trafficking in its communities and the nation; and recognizes that bringing a greater awareness to this problem will help victims;

WHEREAS, By bringing awareness to human trafficking within the [sphere of influence of the Organization] sector, [Organization Name] brings the victims hope, and the natural-born freedoms all human beings should enjoy;

WHEREAS, [Organization Name] recognizes that increased public awareness and education within its organizations will provide more opportunities to recognize and aid in the fight against modern slavery;

NOW, THEREFORE, BE IT RESOLVED BY THE ORGANIZATION THAT:

In keeping with its mission, morals and ideals, [Organization Name] pledges to educate all staff, with an emphasis on those who interact with the general public, on human trafficking.

[Organization Name] will establish reporting mechanisms through which staff can report human trafficking, and ensure that all employees are trained on the reporting protocol.

[Organization Name] supports increased public awareness, stronger laws and the promotion of justice to reduce the exploitation of all peoples.

[Organization Name] will track and share key data points with [Member State CAA] to support measuring the collective impact of counter-trafficking efforts in the aviation sector.

[Organization Name] supports the inclusion of zero-tolerance clauses within procurement contracts with private businesses regarding contractors engaging in any form of human trafficking.

Adopted by [Organization Name] on [Date]

1.3 PUBLIC LEADERSHIP STATEMENT

The model leadership statement below can be used by aviation industry leaders to take a stand against human trafficking as an example for their employees and stakeholders.

Note.— The development of this leadership statement was informed by the USDOT Transportation Leaders Against Human Trafficking leadership statement. The statement may be shared through a State's national air transport facilitation programme to enhance its adoption and increase awareness.

[Organization Name] Public leadership statement against human trafficking

[Date]

Human trafficking is one of the greatest atrocities of the 21st century. With as many as 24.9 million adults and children sold into prostitution, domestic servitude or other forced labour around the globe, it may seem like a problem beyond the borders of [Member State Name]. The truth is, however, that it is happening right here in the communities across [Member State Name].

Those committing this awful crime are using [Member State Name] airways to traffic victims. [Member State Name] cannot allow its aviation system to be an enabler in such awful acts.

[Organization Name] is joining with its partners across the aviation industry to stop the flow of human trafficking. [Organization Name] is committed not only to preparing its employees to recognize and report suspected instances, but also to raising awareness among the public. Its message is that human trafficking will not be tolerated.

In addition to joining the aviation sector effort, [Organization Name] is taking the following measures:

- a) [Insert activity or commitment]
- b) [Insert activity or commitment]

[Organization Name] invites you to join the fight to end modern slavery. Learn the basic indicators of human trafficking and be alert when you travel in and around airports and on aircraft. Your simple act of calling in a tip could save lives and help [Organization Name] move closer to its goal to live in a world without slavery.

Appendix B

INDICATORS OF HUMAN TRAFFICKING IN THE AVIATION SECTOR

Human trafficking victims can be of any age, race, gender, sexual orientation, religion, ethnicity, socioeconomic background or citizenship and possess any immigration status. The indicators of human trafficking are not motivated by any of these classifications, but rather identify objective signs that may indicate potential criminal activity. While no single indicator can confirm a human trafficking situation, several combined indicators may increase the likelihood that a person is being trafficked or actively being targeted and recruited. The following indicators provide employees of the aviation sector and the travelling public with guidance regarding potential indicators of human trafficking that they may encounter in and around airports and aircraft.

Note.— These indicators were adapted from the USDOT ACHT Final Report and Circular 352.

General indicators

- Indicate they are being held against their will.
- Appear fearful, anxious, depressed, submissive, tense, timid, nervous or paranoid.
- Avoid eye contact, interaction with others or are watchful to the point of paranoia.
- Show signs of malnourishment, poor hygiene, fatigue, sleep deprivation, untreated illness, injuries and/or unusual behaviour.
- Branding tattoo that indicates ownership (such as barcode or prostitution related language).
- Wounds, whip marks or bruises at various stages of healing.
- Appear to have lost sense of time.
- Behavioural dependence on travelling companion such as looking to companion before answering questions, looking down and fear of companion.
- Have a language barrier with their travel companion.
- Exhibit evidence of verbal threats, emotional abuse and/or being treated in a demeaning way.
- Are threatened with deportation or law enforcement action.
- Appear drugged or disoriented.
- Avoid and distrust authority figures, including law enforcement.
- Signs of criminal indicators present, such as drugs, stolen property, etc.
- Any acknowledgement of having a pimp or making a quota.

Indicators for frontline aviation employees (check-in, security, concessions, gate or cabin)

- Travelling on a last-minute booking paid by someone else in cash.
 - Do not know the person who purchased their ticket, who is picking them up or who is travelling with them.
 - Minors do not appear to be accompanied by their legitimate parent or guardian.
 - Family member(s) appearing particularly unkempt and uncared for.
 - Are not wearing appropriate clothing or their appearance may not fit the route of travel or weather.
 - Travelling with little or no money or personal items, such as luggage or carry-on bags.
 - Travelling with minimal personal items but carrying condoms, hotel key cards or gift cards.
 - Use prepaid credit cards and gift cards.
 - Controlled by or unusually submissive to a travelling companion.
 - No control of identification documents, travel documents or money, or bear false identity or travel documents.
 - Not allowed to speak for themselves (a third party may insist on speaking or translating for them).
 - Seem coached when talking to authority or law enforcement.
 - Sound scripted or provide inconsistent stories in contrast with travel companion(s).
 - Lie about identity and/or age.
 - Do not know their home or work address.
 - Do not know what city they are in or where they have been.
 - Have no logical means of reaching, or lack knowledge of, final destination.
 - Travelling to obtain a job with no specific information, such as who will be meeting them.
 - May speak of a modeling, acting, dancing, singing, hospitality or labour job with few details about the position, and without knowing who will meet them upon arrival.
 - No freedom of movement or social interaction (such as using the lavatory unaccompanied).
 - Come from a location or State known as a source or destination for trafficking in persons.
-

Appendix C

RESOURCES

The resources below provide aviation organizations with educational materials to develop and bolster their efforts to prevent human trafficking. While not exhaustive, these resources represent some notable materials developed by aviation stakeholders to combat human trafficking within the aviation sector.

Circular 352 – Guidelines for Training Cabin Crew on Identifying and Responding to Trafficking in Persons

<https://www.icao.int/safety/airnavigation/OPS/CabinSafety/Documents/Cir.352.alltext.en.pdf>

Circular 352 provides States and operators with the framework and topics that should be included in the training package. The material focuses on the identification of and response to trafficking in persons, and is aimed particularly at the role of cabin crew members. ICAO recommends that CAAs use the content of this circular as the basis for training programmes for cabin crew and other aviation personnel.

ICAO Tool for Capacity Building of Cabin Crew on Identifying and Responding to Trafficking in Persons

<https://www4.icao.int/learning/>

This free-of-charge eLearning to be used by States and operators enables trainees to understand the issue of trafficking in persons, including the elements of trafficking, why it happens and what is being done to combat it; identify potential cases of trafficking in persons; respond to suspected trafficking in persons, including producing a report of the occurrence; and obtain a certificate of completion at the end of the session. This tool must be supplemented with the operator's specific training on its policies and procedures related to handling suspected cases of trafficking. The guidelines define the specific way personnel must handle any suspected case of trafficking in persons. To register, log on to the tool for capacity building (eLearning). Then, search for the key word "trafficking" or go to the "online" tab at the top of the screen to find it in the course catalogue.

Circular 357 – Guidelines for Reporting Trafficking in Persons by Flight and Cabin Crew

<https://www.icao.int/safety/airnavigation/OPS/CabinSafety/Documents/Circ.357.EN.pdf>

Circular 357 is intended to assist States, their relevant authorities and operators in managing crew reports of suspected cases of trafficking in persons in the aviation sector. These guidelines are to be used in conjunction with Circular 352.

International Air Transport Association (IATA)

<https://www.iata.org/en/policy/consumer-pax-rights/human-trafficking/>

IATA adopted a resolution to highlight the industry's commitment to combat human trafficking and developed training resources for airlines, including a free online tutorial for airline staff, a one-page summary of human trafficking signs, guidance for airlines, a video and a two-day classroom training. Their 2018 *Guidance on Human Trafficking* provides aircraft operators with guidelines for combating human trafficking specific to air carriers. IATA also works with governments and law enforcement to compile inflight reporting mechanisms for member airlines.

Airports Council International (ACI)

<https://aci.aero/2016/09/28/airports-council-international-expressed-airports-commitment-to-the-fight-against-human-trafficking/>

ACI adopted a counter-trafficking resolution and developed a toolkit to raise member awareness and an online training course. The 2019 *Combatting Human Trafficking Handbook* draws on the experience of airports to provide guidance on counter-trafficking steps.

— END —

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